

Declaration of Mike Kanovitz

I, Mike Kanovitz, under penalty of perjury, state that the following is true and accurate to the best of my knowledge and recollection:

1. I have been involved in the Clearview litigation since the earliest stages of L&L's evaluation, beginning in November 2019, supervising Mr. Miller as well as Mr. Drury. When the *New York Times* article came out unexpectedly in January 2020, Mr. Kanovitz drafted sections and edited the complaint so we could be the first to file two days later.
2. I stayed involved thereafter as a supervisor, advisor, and hands-on participant. By way of examples, I participated in: locating and adding additional defendants; identifying sources for discovery; reviewing FOIA documents; strategizing and litigating the multidistrict conflicts among firms vying to represent the class in New York and elsewhere; working with opposing counsel once they appeared; working on the preliminary injunction motion; briefing on the original motion to appoint L&L; drafting the firm's resume to establish the firm's class action credentials; responding to the competing firms' efforts to be appointed in other venues; briefing on motion to transfer; intervening in the New York venue; decision making on adding and dismissing additional defendants; mediation efforts in late 2020, and continuing through 2021; evaluating insurance policies; strategizing for the MDL proceedings; drafting portions of plaintiff's mediation statement and formulating viable programmatic relief as part of a potential resolution; negotiation of the joint prosecution agreement between L&L on the one hand and the Bursor and Hedin firms on the other; research regarding Clearview's patents and its Singapore subsidiaries; formulating information requests in the context of settlement; litigating the lead counsel motions following the JPML ruling; researching the injunction of state court proceedings in aid of the federal court's jurisdiction; and addressing conflict issues and staffing, among other matters.

3. Former L&L associate Mr. Miller's work at the firm was almost entirely dedicated to the privacy cases. Beyond conceiving/developing the Clearview case, he helped draft the complaint and other pleadings, including a lead role in drafting the motion and the reply in support of preliminary injunction, as well as a lead role in drafting the response to Defendants' motion to dismiss.
4. Scott Rauscher, a L&L partner with class action experience, also drafted pleadings in the Clearview case, including the initial draft of the motion to appoint the firm as lead counsel. When Mr. Drury was too busy with other matters, Mr. Rauscher provided other support, including drafting responses to multiple sets of written discovery.

/s/ Mike Kanovitz

Dated: 10/21/2022